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EIS000258

NOV 04 1999

**STATEMENT OF SUSAN ZIMMERMAN ON BEHALF OF  
ROBERT R. LOUX, EXECUTIVE DIRECTOR OF THE STATE OF NEVADA  
AGENCY FOR NUCLEAR PROJECTS, REGARDING THE  
U.S. DEPARTMENT OF ENERGY'S DRAFT ENVIRONMENTAL IMPACT  
STATEMENT FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF  
SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT  
YUCCA MOUNTAIN, NEVADA**

**PRESENTED AT THE PUBLIC HEARING IN  
LONE PINE, CALIFORNIA  
NOVEMBER 4, 1999**

In order for people to participate in the National Environmental Policy Act (NEPA) process, they must first be afforded the opportunity to know that a major federal action has the potential to impact them and their communities. While the U.S. Department of Energy (DOE) is conducting public hearings in various communities in Nevada and around the country, DOE has made no effort to inform citizens and public officials of the relevance of the draft Environmental Impact Statement (EIS) to them and their states and communities.

1 [The notices for this public hearing, for example, refer only to a draft EIS for a radioactive waste repository at Yucca Mountain, Nevada. They do NOT indicate that people in Inyo and San Bernadino counties and other parts of California stand to be significantly impacted by radioactive materials shipments as a direct result of the Yucca Mountain program.

One can only conclude that such an oversight is intentional and designed to suppress public interest in the project and participation in the public hearings.]

2 Not only is the noticing for the public hearings deficient, but [the draft EIS itself fails to identify the cross-country rail and truck routes used in DOE's transportation impact analysis, and fails to identify potential transportation routes to Yucca Mountain through California. The document further fails to provide a meaningful analysis of the potential impacts on California of rail and truck transportation to the proposed repository.]

6... A 1996 study prepared for the State of Nevada by Planning Information Corporation (PIC) identified routes to Yucca Mountain through California, which might be used by DOE and its contractors under a consolidated southern routing strategy. Under this approach, the most likely east-west highway corridors would be I-44 from Missouri to Oklahoma, I-40 from Tennessee to California, and I-15 from California to Nevada. The most likely east-west rail corridor would be the Santa Fe-Burlington Northern line from Kansas City to San Bernardino, connecting with the Union Pacific from San Bernardino to Nevada. These routes are shown in Attachment 1.

Using the shipment numbers in the draft EIS and the routing study prepared by PIC, the State of Nevada has developed a preliminary estimate of potential legal-weight truck shipments

6 cont. through California to Nevada. Table 1 shows that 74,000 truck shipments, about three-quarters of the total, could traverse Southern California under DOE's mostly truck scenario. There could be an average of five truck shipments through California every day, seven days a week, for 39 years.]

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[The DEIS evaluates a mostly truck scenario and a mostly rail scenario. Nevada believes that the final EIS must evaluate a third transportation scenario based on the current transportation capabilities of reactor and storage sites. Under the "current capabilities" scenario, there could be more than 26,000 truck shipments (Table 2) and more than 9,800 rail shipments (Table 3) through California. Under this scenario, California would receive an average of two truck shipments per day and four to five rail shipments per week for 39 years.

This potential level of shipments through California certainly constitutes a significant impact which should have been identified and evaluated in the draft EIS.]

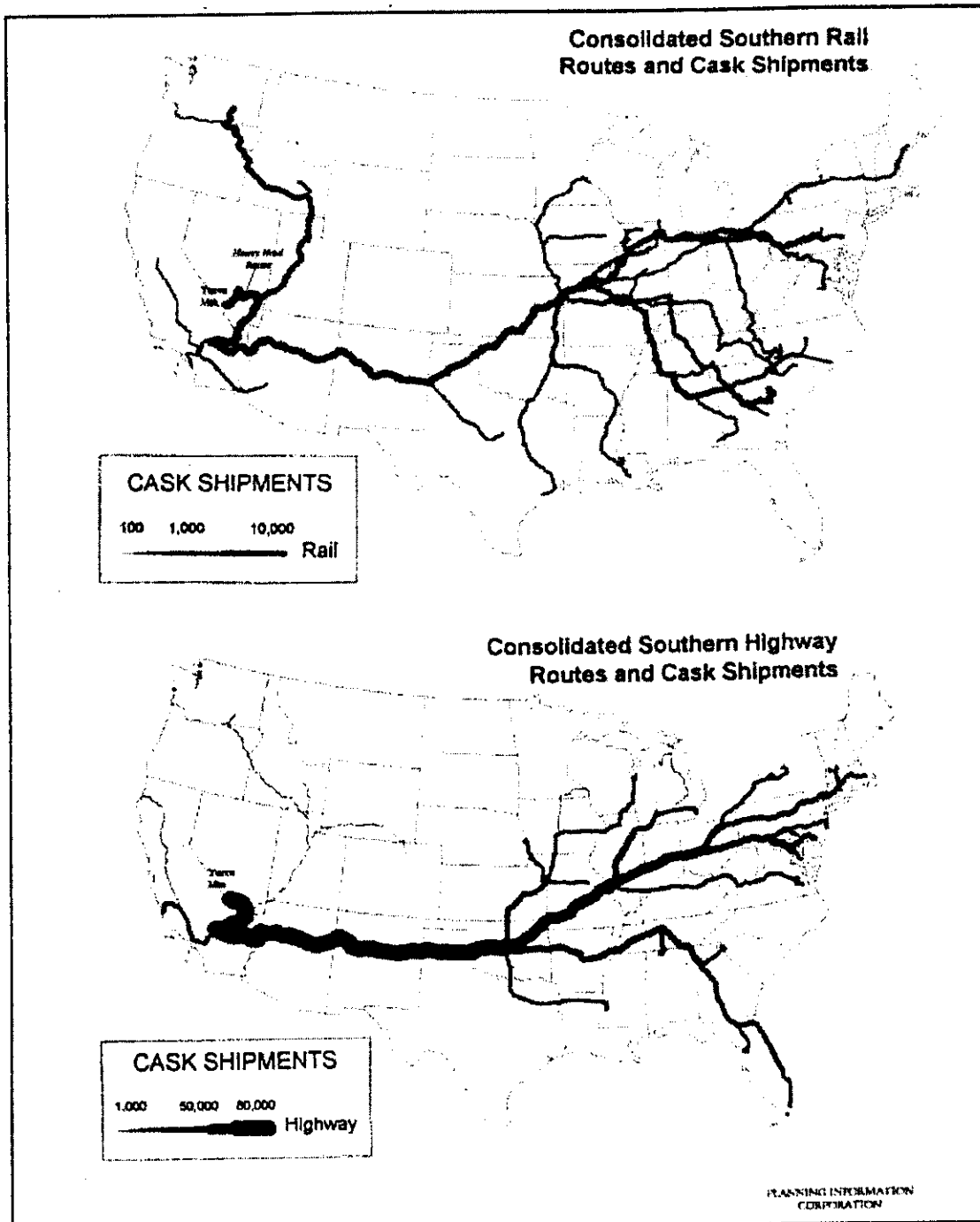
4

[Nevada believes that DOE has violated NEPA by concealing crucial information used in the draft EIS. Absent this information, persons affected by the transportation impacts of the proposed action have no way of determining the legal sufficiency of DOE's analysis. Moreover, DOE's attempted concealment of the shipment routes is a deviation from DOE's past practice of identifying the most likely transportation routes in NEPA documents, such as the Waste Isolation Pilot Plant (WIPP) EIS and Supplemental EIS. This action can only diminish public confidence in DOE's ability to safely transport these highly radioactive materials.]

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The State of Nevada will be submitting extensive written comments on this Draft Environmental Impact Statement for a high-level nuclear waste repository at Yucca Mountain. It is our hope that these comments and those of all others will be seriously considered, and that a reasonable No Action alternative (as opposed to the unreasonable and unrealistic ones contained in the draft document) is selected as the preferred action in the Final Environmental Impact Statement.]

ATTACHMENT 1



<b>YMDEIS TRANSPORTATION IMPACTS</b>				
<b>MAXMUM SHIPMENTS THROUGH SOUTHERN CALIFORNIA</b>				
<b>NATIONAL MOSTLY TRUCK SCENARIO, DOE MODULE 2</b>				
<b>CONSOLIDATED SOUTHERN ROUTING</b>				
CALIFORNIA TOTAL				74050
CORRIDOR I-5/I-10/I-15				5258
Humboldt Bay(CA)			44	
Rancho Seco(CA)			124	
Diablo Canyon(CA)			1308	
San Onofre(CA)			1284	
Palo Verde(CA)			2498	
Corridor Subtotal			5258	
CORRIDOR I-40/I-15				68792
Browns Ferry(AL)			2067	
Farley(AL)			1126	
Arkansas(AR)			963	
Haddam Neck(CT)			255	
Millstone(CT)			1669	
Crystal River(FL)			442	
St. Lucie(FL)			1086	
Turkey Point(FL)			871	
Hatch(GA)			1334	
Vogtle(GA)			1462	
Arnold(IA)			420	
Braidwood(IL)			1494	
Byron(IL)			1444	
Clinton(IL)			690	
Dresden/Morris(IL)			1569	
La Salle(IL)			1261	
Quad Cities(IL)			1123	
Zion(IL)			1028	
Wolf Creek(KS)			708	
River Bend(LA)			823	
Waterford(LA)			675	
Pilgrim(MA)			476	
Yankee-Rowe(MA)			134	
Calvert Cliffs(MD)			1140	
Maine Yankee(ME)			356	
Big Rock Point(MI)			131	
Cook(MI)			1235	
Fermi(MI)			764	

TABLE 1

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Palisades(MI)		454	
Monticello(MN)		342	
Prairie Island(MN)		805	
Callaway(MO)		735	
Grand Gulf(MS)		1016	
Brunswick(NC)		903	
Harris(NC)		921	
McGuire(NC)		1464	
Cooper(NE)		454	
Fort Calhoun(NE)		362	
Seabrook(NH)		630	
Oyster Creek(NJ)		519	
Salem/Hope Creek(NJ)		1992	
Fitzpatrick/Nine Mile(NY)		1971	
Ginna(NY)		379	
Indian Point(NY)		1155	
Davis-Besse(OH)		535	
Perry(OH)		631	
Beaver Valley(PA)		1156	
Limerick(PA)		1722	
Peach Bottom(PA)		1408	
Susquehanna(PA)		1582	
Three Mile Island(PA)		435	
Catawba(SC)		1,330	
Oconee(SC)		1500	
Robinson(SC)		306	
Summer(SC)		538	
DOE-Savannah River(SC)		8131	
Sequoyah(TN)		1179	
Watts Bar(TN)		840	
Comanche Peak(TX)		1558	
South Texas(TX)		1448	
North Anna(VA)		1079	
Surry (VA)		902	
Vt Yankee(VT)		484	
Kewaunee(WI)		401	
LaCrosse(WI)		37	
Point Beach(WI)		742	
Corridor Subtotal		68792	

<b>YMDEIS TRANSPORTATION IMPACTS</b>				
<b>TRUCK SHIPMENTS THROUGH SOUTHERN CALIFORNIA</b>				
<b>NEVADA CURRENT CAPABILITIES SCENARIO, DOE MODULE 2</b>				
<b>CONSOLIDATED SOUTHERN ROUTING</b>				
CALIFORNIA TOTAL			26375	
CORRIDOR I-5/I-10/I-15			1352	
Humboldt Bay(CA)			44	
Diablo Canyon(CA)			1308	
Corridor Subtotal			1352	
CORRIDOR I-40/I-15			25023	
Browns Ferry(AL)			2067	
Haddam Neck(CT)			255	
Crystal River(FL)			442	
St. Lucie(FL)			1086	
Turkey Point(FL)			871	
Dresden/Morris(IL)			1569	
Pilgrim(MA)			476	
Yankee-Rowe(MA)			134	
Calvert Cliffs(MD)			1140	
Big Rock Point(MI)			131	
Cook(MI)			1235	
Fermi(MI)			764	
Palisades(MI)			454	
Monticello(MN)			342	
Callaway(MO)			735	
Grand Gulf(MS)			1016	
Cooper(NE)			454	
Fort Calhoun(NE)			362	
Oyster Creek(NJ)			519	
Salem/Hope Creek(NJ)			1992	
Fitzpatrick/Nine Mile(NY)			1971	
Ginna(NY)			379	
Indian Point(NY)			1155	
Peach Bottom(PA)			1408	
Oconee(SC)			1500	
Surry (VA)			902	
Vt Yankee(VT)			484	
Kewaunee(WI)			401	
LaCrosse(WI)			37	
Point Beach(WI)			742	
Corridor Subtotal			25023	

TABLE 3					
YMDEIS TRANSPORTATION IMPACTS					
RAIL SHIPMENTS THROUGH SOUTHERN CALIFORNIA					
NEVADA CURRENT CAPABILITIES SCENARIO, DOE MODULE 2					
CONSOLIDATED SOUTHERN ROUTING					
CALIFORNIA TOTAL					9831
UNION PACIFIC(SP) from Rancho Seco					
Rancho Seco(CA)		21			21
BURLINGTON NORTHERN/SANTA FE from San Onofre					
San Onofre(CA)		207			207
UNION PACIFIC(SP) from Palo Verde via Yuma, AZ					
Palo Verde(CA)		350			350
BURLINGTON NORTHERN/SANTA FE from Kingman, AZ					9253
Farley(AL)			157		
Arkansas(AR)			252		
Millstone(CT)			524		
Hatch(GA)			197		
Vogtle(GA)			431		
Arnold(IA)			158		
Braidwood(IL)			215		
Byron(IL)			244		
Clinton(IL)			200		
La Salle(IL)			172		
Quad Cities(IL)			419		
Zion(IL)			250		
Wolf Creek(KS)			106		
River Bend(LA)			101		
Waterford(LA)			91		
Maine Yankee(ME)			60		
Prairie Island(MN)			221		
Brunswick(NC)			321		
Harris(NC)			258		
McGuire(NC)			427		
Seabrook(NH)			83		
Davis-Besse(OH)			71		
Perry(OH)			82		
Beaver Valley(PA)			160		
Limerick(PA)			497		

TABLE 3

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Susquehanna(PA)		219			
Three Mile Island(PA)		113			
Catawba(SC)		253			
Robinson(SC)		97			
Summer(SC)		82			
DOE-Savannah River(SC)		1739			
Sequoyah(TN)		161			
Watts Bar(TN)		121			
Comanche Peak(TX)		246			
South Texas(TX)		358			
North Anna(VA)		167			
Corridor Subtotal		9253			